



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 11, 2022

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's January 26, 2022 Order (Dkt. No. 585), which directed the Government to respond to the New York Times Company's motion to unseal the completed questionnaires for the twelve seated jurors in this case (Dkt. No. 583). The Government agrees with the New York Times Company that the questionnaires for the twelve seated jurors should be made public, with limited redactions to protect juror privacy. Under the circumstances presented here, where jury selection and the trial have been completed, releasing juror questionnaires is consistent with the strong presumption of access to the jury selection process, including juror questionnaires. *See United States v. King*, 140 F.3d 76, 80 (2d Cir. 1998); *United States v. Avenatti*, No. 19 Cr. 373 (PGG), 2021 WL 2809919, at *48 (S.D.N.Y. July 6, 2021).

Regarding redactions, the Government proposes limited redactions to only one juror questionnaire and will submit the proposed redactions by email to Chambers. The redactions are limited to sensitive personal information, which the juror discussed at a sealed sidebar during voir dire. Aside from the limited redactions on one juror's questionnaire, the Government otherwise

Cc: Defense Counsel (By ECF)